

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 12-16813-elf**
Bernard X. Shumbusho : **Chapter 13**
: **Judge Eric L. Frank**
Debtor(s) : *********
:
Deutsche Bank Trust Company : **Time of Hearing**
Americas, as Trustee for Residential : **September 15, 2016 @ 10:00 a.m.**
Accredit Loans, Inc., Mortgage Asset- :
Backed Pass-Through Certificates, : **Place of Hearing**
Series 2006-QS16 : **U.S. Bankruptcy Court**
Movant, : **900 Market Street**
vs : **Courtroom 1**
: **Philadelphia, PA 19107**
Bernard X. Shumbusho and William C. :
Miller, Chapter 13 Trustee, :
Respondents.

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QS16 has filed a Motion for Relief from the Automatic Stay *Nunc Pro Tunc* with the Court to permit Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QS16 to foreclose on the real property at 263 N. Wycombe Ave, Lansdowne, PA 19050.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **September 8, 2016**, you or your attorney must do **ALL** of the following:

A. File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court
U.S. Bankruptcy Court
900 Market Street
Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee
Office of the U.S. Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107

William C. Miller
1234 Market Street
Suite 1813
Philadelphia, PA 19107
ecfemails@ph13trustee.com

Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on **September 15, 2016 at 10:00 a.m.** in Courtroom 1 at U.S. Bankruptcy Court, 900 Market Street, Philadelphia, PA, 19107.
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: 8/22/16

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Motion,
Response Deadline and Hearing Date, and Motion for Relief from the Automatic Stay *Nunc*
Pro Tunc, was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, 1234 Market Street, Suite 1813, Philadelphia, PA
19107

Michael A. Cataldo2, Attorney for Bernard X. Shumbusho, Cibik & Cataldo, P.C., 1500
Walnut Street, Suite 900, Philadelphia, PA 19102, ecf@ccpclaw.com

Michael A. Cibik2, Attorney for Bernard X. Shumbusho, 1500 Walnut Street, Suite 900,
Philadelphia, PA 19102, ecf@ccpclaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on August 22, 2016:

Bernard X. Shumbusho, 6560 Market Street, Philadelphia, PA 19082

Bernard X. Shumbusho, 263 N. Wycombe Ave, Lansdowne, PA 19050

DATE: 8/22/16

/s/ Kimberly A. Bonner

Karina Velter, Esquire (94781)

Kimberly A. Bonner (89705)

Holly N. Wolf (322153)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is

Karina Velter.

Contact email is kvelter@manleydeas.com